

# EXHIBIT P

Howard C. Jordi, Ph.D.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION  
Master File No. 2:12-MD-02327

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IN RE: ETHICON, INC. MDL No. 2327  
PELVIC REPAIR SYSTEM,  
PRODUCTS LIABILITY  
LITIGATION

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This Document Relates to:  
Carolyn Lewis, Et Al v. Ethicon, Inc.  
Case No. 2:12-CV-04301

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IN THE DISTRICT COURT, 95th JUDICIAL DISTRICT  
DALLAS COUNTY, TEXAS

Linda Batiste,  
Plaintiff,  
v. Cause No.  
John Robert McNabb, M.D., DC-12-14350  
Johnson & Johnson and Ethicon, Inc.,  
Defendants.

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DEPOSITION OF HOWARD C. JORDI, Ph.D.  
Wednesday, October 30th, 2013  
9:05 a.m.

Held At:

Jordi Lab  
200 Gilbert Street  
Mansfield, Massachusetts

REPORTED BY:  
Maureen O'Connor Pollard, RPR, CLR, CSR #149108

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1        "The control and explant samples do not show a  
2        significant difference in molecular weight."

3              Correct?

4              A.     That's correct.

5              Q.     Doesn't that mean that there's no  
6        evidence in your molecular weight analysis that  
7        polypropylene is degrading?

8              A.     It might seem so at first  
9        consideration. But remember, the only part of  
10      the polymer that seems to be degrading based on  
11      the SEM photos is the surface.

12             So GPC is a bulk technique, I had to  
13      dissolve the inside undamaged region as well as  
14      the broken pieces, but I get one sample. The  
15      total mixture dissolved.

16             So number one, the effect of the  
17      damaged surface -- my point here is I think if  
18      we could measure the surface we would see a loss  
19      in molecular weight, but I had no way to get  
20      enough pieces to measure the molecular weight of  
21      only the surface pieces like I did for the  
22      infrared spectra.

23             Q.     Aren't you speculating what you find?

24             A.     I am.

25             Q.     Until you have the opportunity to test

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1       as you've described, the fact that your  
2       molecular weight testing does not show a  
3       significant difference in molecular weight  
4       suggests that there's no degradation of the  
5       polypropylene. That's the best scientific  
6       conclusion you can reach in this data, isn't  
7       that true?

8           A.    It's one of the conclusions, yes.

9           Q.    It's --

10          A.    It's not the only one.

11          Q.    It's fair to say -- okay.

12                 Now, has Jordi Labs analyzed  
13       polypropylene mesh for other manufacturers?

14          A.    I don't run the day-to-day operations  
15       anymore, so I would have no way to answer that  
16       question. I don't know what has come in.

17          Q.    Do you know?

18          A.    I do not know.

19          Q.    Do you know whether Jordi Labs  
20       analyzed Bard mesh that was at issue in the West  
21       Virginia litigation?

22          A.    I don't know.

23          Q.    Do you know whether Bard mesh has  
24       antioxidants in it?

25          A.    I haven't been requested to analyze,

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1 COMMONWEALTH OF MASSACHUSETTS )

2 SUFFOLK, SS. )

3 I, MAUREEN O'CONNOR POLLARD, RPR, CLR,  
4 and Notary Public in and for the Commonwealth of  
5 Massachusetts, do certify that on the 30th day  
6 of October, 2013, at 9:05 o'clock, the person  
7 above-named was duly sworn to testify to the  
8 truth of their knowledge, and examined, and such  
9 examination reduced to typewriting under my  
10 direction, and is a true record of the testimony  
11 given by the witness. I further certify that I  
12 am neither attorney, related or employed by any  
13 of the parties to this action, and that I am not  
14 a relative or employee of any attorney employed  
15 by the parties hereto, or financially interested  
16 in the action.

17 In witness whereof, I have hereunto  
18 set my hand this 1st day of November, 2013.

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21 MAUREEN O'CONNOR POLLARD, NOTARY PUBLIC  
22 Realtime Systems Administrator  
23 CSR #149108

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